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Title:

Comments: Please accept these comments regarding the U.S. Forest Service's proposal to renew existing outfitter permits in the three Wildernesses which collectively comprise the Bob Marshall Wilderness Complex. (Please note that because the Forest Service has not disclosed which permits are involved, their locations, or any associated information, they have made it impossible to provide meaningful public input).

The Bob Marshall Wilderness Complex helps protect one of the last great expanses of biodiversity in the world. Its more than 1.5 million acres of Wilderness are some of the best habitat for native wildlife such as grizzly bears, Canada lynx, wolverine, elk, gray wolves, moose, black bears, mountain lions, mountain goats, and bighorn sheep.

While there has been a long history of outfitting and guiding in the "Bob," and many outfitters there have been great supporters of protecting these Wildernesses, outfitting and camps still have impacts which are often glossed over or overlooked. They include Wilderness trails so heavily used by pack animals that they more resemble roads than foot or horse trails, and outfitter campsites in Wilderness that are allowed to have structures like tent frames, corrals, and hitching posts. All of these outfitter impacts are exacerbated by the extraordinarily large people and pack stock party sizes allowed in the Wildernesses.

The Forest Service's new proposal is to renew 62 special use outfitter permits that will be in place for at least a decade, without disclosing the impacts from these commercial operations. The agency's scoping letter lacks important information, such as annual inspections and public complaints, and on top of that, the agency proposes to approve the renewals with a Categorical Exclusion (CE), rather than go through a more rigorous environmental review. This is unacceptable, simply due to the fact that the Forest Service's primary function and responsibility is to preserve the wilderness character of the Bob Marshall Wilderness Complex, not to promote any particular use, such as outfitting/guiding.

The Forest Service must make the following information available for public review on its website and must also extend the public comment period for another 45 days after information is published on the website:

- 1. Permitted service days versus actual use for each permit;
- 2. Annual inspections, performance evaluations, or public complaints related to each campsite or operator;
- 3. Any NEPA documents and related decisions dealing with outfitting service levels or allocation in the Bob Marshall Wilderness Complex;
- 4. The Bob Marshall Wilderness Complex Character Narrative;
- 5. 2017 needs assessment and extent necessary documentation;
- 6. Campsite Management Plans for each outfitter camp.

The Forest Service must not use a Categorical Exclusion (CE) to renew any outfitter permits, given the numerous impacts outfitting has on the Wilderness. An Environmental Assessment or Environmental Impact Statement with accompanying public input is necessary to properly protect this fabled Wilderness Complex.

Thank you for the opportunity to comment and please provide further opportunity to comment on the information needed to adequately address the issues.